

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of
Creation of a Low
Power Radio Service

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MM Docket No. 99-25
RM-9208
RM-9242

**Comments of
Montecito FM, Inc.**

Montecito FM, Inc., (MFM), licensee of commercial FM radio
station KJEE hereby files these comments.

MFM is a private corporation held by a single shareholder
operating a single independent station. Station KJEE has been
on the air over 5 years. The introduction of new allocations
may have an adverse effect on it's station.

MFM received it's allocation for channel 225A Montecito, CA as a
result of Docket 8090, a comparative hearing proceeding. The
proceeding for 225A began with approximately 35 eager

applicants. Over an eight year period, applicants dropped out sustaining losses. The final settlement included 4 other applicants believed also to have lost much time and money.

KJEE debuted in the winter of 1994 and was an immediate popular success. Newspaper articles described the station as an alternative to the institutional radio establishment. Despite it's popularity, MFM has yet to turn a profit.

Unfortunately expenses that even low profile broadcasters incur such as music royalties (ASCAP, BMI, SESAC), power bills, and computer programs weigh on broadcast stations. While probably losing some zealot listeners, MFM has gradually turned to mass appeal. Tied for number one in it's last ratings survey MFM hopes to pay off debit.

MFM has learned by experience that serving niche markets isn't practical. While good intentioned many of the proponents in support for LPFM allocations probably have no idea of these realities. Out of the possibly thousands of applicants for some allocations only one applicant will move forward. This grantee could likely have an effect of blanketing other existing stations or replacing translator services. As an alternative MFM would suggest that individuals who wish to become involved

in broadcasting inquire about shifts at local noncommercial stations, consider the amateur radio service, or investigate opportunities on the internet.

Concerning the proposed micropower radio service, mobile vehicles would quickly pass through the service contour of a micropower station. Thus, a micropower service would seem more point to point oriented. The same effect could possibly be achieved using present or future internet technology. Most troubling is the effect such a service might have on interference caused to existing broadcasters. A proliferation of mass produced, low cost, low wattage transmitters could lead to chaos. MFM is concerned that multiple interference sources from unlicensed micropower transmitters would leave the 88-108 MHz band a spectral wasteland similar to what has been seen in some land mobile radio bands.

With new technologies such as satellite radio, internet radio, and wireless internet, it is disappointing to MFM that the commission is considering this proceeding at this time. MFM's ability to operate may be questionable without reducing services to the public. MFM can't presently compete technically with future competitors featuring CD quality audio. What effect a technically inferior signal may have on the listening audience

is troubling and unpredictable. The addition of new allocations may affect MFM's ability to improve it's signal.

Sincerely,

James E. Evans
President and Shareholder
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